

**From:** [Berg, Marlene](#)  
**To:** [Tzhone, Stephen](#)  
**Subject:** RE: Arkwood soil sampling evaluation; FW: Revised Sampling Evaluation Report  
**Date:** Wednesday, January 20, 2016 4:58:48 PM

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Hi Steve,

For non-residential, non-commercial, non-industrial, what risk assessors do is a site-specific risk assessment, using site-specific factors. This applies for any contaminant, including dioxin.

For example, Kelly Schumacher, the risk assessor in Region 7, did a dioxin risk assessment for the Strecker Forest residential area, a recreational scenario, if I remember correctly. And, I believe that the risk assessment for the Route 66 State Park (former Times Beach site) included an outdoor worker scenario. I suggest contacting Region 7. If the Arkwood maintenance scenario doesn't match any scenarios in Region 7, I would have either Ghassan or John send out a request to the regional risk assessors (OHHRRAF) to find a risk assessor with a maintenance scenario.

Marlene

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**From:** Tzhone, Stephen  
**Sent:** Tuesday, January 19, 2016 6:04 PM  
**To:** Berg, Marlene <[Berg.Marlene@epa.gov](mailto:Berg.Marlene@epa.gov)>  
**Subject:** RE: Arkwood soil sampling evaluation; FW: Revised Sampling Evaluation Report

Hi Marlene, my mgmt asking if any responses to this...

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**From:** Tzhone, Stephen  
**Sent:** Thursday, January 07, 2016 11:28 AM  
**To:** Berg, Marlene  
**Cc:** Sanchez, Carlos; Meyer, John  
**Subject:** RE: Arkwood soil sampling evaluation; FW: Revised Sampling Evaluation Report

Hi Marlene,

My interpretation is that McKesson/Cardno is identifying that areas outside the cap are above the new dioxin industrial goal, but below the maintenance worker risk scenario (and adolescent trespasser risk scenario).

However, additional issues would have to be resolved, for those other scenarios to be approved (not just identified) for cleanup.

I had discussed this with Carlos yesterday and asked for his opinion and he agrees. Basically, the additional issues involve:

- continuing off-site delineation of areas exceeding industrial (but which may be suitable for maintenance and/or adolescent trespasser risk)
- ownership of those areas (which affects anticipated future land use)



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- and security/ICs on those areas

\*Thoughts...? Has EPA entertained non-residential, non-commercial, non-industrial scenarios for cleanup before? On dioxin sites? And with what parameters (those above)?

Thanks,

Stephen L. Tzhone  
Superfund Remedial Project Manager  
214.665.8409  
[tzhone.stephen@epa.gov](mailto:tzhone.stephen@epa.gov)

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**From:** Berg, Marlene  
**Sent:** Wednesday, January 06, 2016 6:15 PM  
**To:** Tzhone, Stephen  
**Subject:** FW: Arkwood soil sampling evaluation; FW: Revised Sampling Evaluation Report

Steve,  
I didn't have anything to add beyond Deana's comment, except for one item.

Am I reading the last paragraph of Cardno's December 30, 2015, letter in that they will clean up the site (DUs 1,3,4,5,6), to the maintenance worker scenario, as they are not aware of any plans for future industrial use?

Marlene

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**From:** Tzhone, Stephen  
**Sent:** Tuesday, January 05, 2016 12:23 PM  
**To:** Rauscher, Jon <[Rauscher.Jon@epa.gov](mailto:Rauscher.Jon@epa.gov)>; Khoury, Ghassan <[Khoury.Ghassan@epa.gov](mailto:Khoury.Ghassan@epa.gov)>; Berg, Marlene <[Berg.Marlene@epa.gov](mailto:Berg.Marlene@epa.gov)>; Crumbling, Deana <[Crumbling.Deana@epa.gov](mailto:Crumbling.Deana@epa.gov)>; Moix, Mark <[MOIX@adeq.state.ar.us](mailto:MOIX@adeq.state.ar.us)>; Telisak, Theodore <[ttelisak@eaest.com](mailto:ttelisak@eaest.com)>  
**Cc:** Sanchez, Carlos <[sanchez.carlos@epa.gov](mailto:sanchez.carlos@epa.gov)>; Meyer, John <[Meyer.John@epa.gov](mailto:Meyer.John@epa.gov)>; Villarreal, Chris <[villarreal.chris@epa.gov](mailto:villarreal.chris@epa.gov)>  
**Subject:** Arkwood soil sampling evaluation; FW: Revised Sampling Evaluation Report

Hi Arkwood team and risk assessors,

Attached is McKesson's response to our comments re: the soil sampling evaluation.

Please review and send any comments by Friday Jan. 29, 2016.

If no further comments and you are in agreement with the soil report (esp. the section on comparison to soil screening levels and table 5), then please indicate that as well.

Thanks,

Stephen L. Tzhone  
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**From:** Fleer, James [<mailto:James.Fleer@McKesson.com>]  
**Sent:** Thursday, December 31, 2015 10:01 AM  
**To:** Tzhone, Stephen; Moix, Mark  
**Subject:** Revised Sampling Evaluation Report

Good morning Stephen and Mark,

Attached is the response to comments and revised Sampling Evaluation Report for the Arkwood Site. The response to comments and revised report addresses the soil sampling event undertaken in October 2014 as a component of the dioxin reassessment process.

If you have any questions, please let me know.

Best Regards,

***Jim***

**James Fleer**

Director, Environmental Services  
McKesson Corporation  
913.238.8348

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